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December 27, 2005

## COMPLIANCE LETTER

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: In the Matter of IP-Enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196**

Dear Ms. Dortch:

This letter provides an update on Verizon's progress in providing 911 capability to its VoiceWing customers, as described in our October 21 Letter. *See* Letter from Susanne A. Guyer, Verizon, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Oct. 21, 2005). As we explained there, Verizon has worked diligently to develop and acquire the systems and capabilities to provide 911 services to VoiceWing customers in compliance with the Commission's *VoIP 911 Order*. Since November 28, we have continued to work with our vendors to expand the areas where E911 service is available. As a result, the number of VoiceWing customers with E911 capability has increased substantially since November 28.

As of December 18, 2005, Verizon is able to offer E911 services to approximately 30 percent of its customers covered by the Commission's order. These include customers whose registered locations are in areas served by PSAPs with full E911 capabilities as well as customers served by PSAPs that are connected to selective routers, but that cannot receive and process Registered Location information.

In addition, as of December 18, the number of "grandfathered" customers<sup>1</sup> has decreased by approximately 14 percent since November 28. In addition, as we previously explained, as of November 28, Verizon only accepts new customers for VoiceWing's service in areas where its vendor is capable of providing E911 services or in areas served by a PSAP that is not connected to the existing Wireline E911 system.

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<sup>1</sup> These "grandfathered" customers are customers who subscribed to VoiceWing prior to November 28 and whose registered locations are in areas served by PSAPs connected to selective routers, but for whom Verizon's vendor could not provide E911 service.

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As confirmed in our November 28 compliance letter, Verizon has implemented an automatic detection capability that will identify when a customer may have moved her or his location. This capability is in place for all existing VoiceWing customers.

Finally, within 10 business days of the end of each month, Verizon will make contributions in equal amounts to the Public Safety Foundation of America and the Fraternal Order of Police Foundation with respect to "grandfathered customers" as described in our October 21 letter. Because Verizon has succeeded in implementing an automatic move detection capability for all VoiceWing customers, the "grandfathered customers" that will be counted for purposes of determining the amount of this contribution will be only those customers whose registered locations are in areas served by PSAPs that are connected to selective routers, but for whom Verizon's vendor is not yet able to provide E911 service.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Grillo". The signature is written in a cursive, flowing style.

cc: Daniel Gonzalez  
Michelle Carey  
Kathryn Berthot  
Janice Myles